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VIA ECF ONLY

The Honorable Vincent I. Bricetti
United States Courthouse Courtroom 620
300 Quarropas Street
White Plains, NY 10601

Re: Mayhew, et al. v., KAS Direct LLC, and S.C. Johnson & Son, Inc. - 16-cv-6981

Dear Judge Bricetti:

We represent the Plaintiffs in the above-referenced action. We respectfully request leave to file under seal an unredacted version of Exhibit 4 to the Declaration of Jason P. Sultzer in Support of Plaintiffs' Motion for Final Approval of the Class Action Settlement, a summary of the sales data for the products at issue in this case, which was produced by Defendants in the course of discovery. The sales summary was marked as confidential pursuant to the Stipulation and Protective Order (Dkt. 21) as well as FRCP 408.

In the interest of providing full information to the Court regarding the sales of the products at issue, Plaintiffs request leave to file an unredacted version of the sales summary under seal, pursuant to the Stipulation and Protective Order. Pursuant to the Southern District of New York Steps for E-Filing Sealed Documents, a redacted version of Exhibit 4 will be filed with Mr. Sultzer's declaration.

A Proposed Order is also attached for the Court's convenience.

Sincerely,

s/ Charles J. LaDuca

Charles J. LaDuca, Esq.